

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

)	
IN RE PHARMACEUTICAL INDUSTRY)	MDL NO. 1456
AVERAGE WHOLESALE PRICE)	
LITIGATION)	CIVIL ACTION NO. 01-CV-12257-PBS
)	
)	Hon. Patti B. Saris
THIS DOCUMENT RELATES TO)	
ALL ACTIONS)	
)	

**TRACK 1 DEFENDANTS' STIPULATION AS TO KNOWLEDGE OF
CHERYL BARRECA, ANNA CHOICE, TRACY GARCIA, REBECCA HOPKINS
AND CLASS THREE CONSUMERS**

Defendants AstraZeneca Pharmaceuticals LP, Bristol-Meyers Squibb Company, Oncology Therapeutic Networks, Corp., Johnson & Johnson, Schering-Plough Corporation and Warrick Pharmaceuticals Corporation (collectively, the “Track 1 Defendants”) stipulate and agree that the following individuals, listed as witnesses on Plaintiffs’ Disclosures Pursuant to the Court’s Amended Pretrial Order of August 21, 2006, did not have any knowledge about the meaning of the term “Average Wholesale Price” or “AWP”: (1) Cheryl Barreca; (2) Anna Choice; (3) Tracy Garcia; and (4) Rebecca Hopkins. The Track 1 defendants further stipulate and agree that individual consumers that are members of Class 3 generally would not have any knowledge about the meaning of the term “Average Wholesale Price” or “AWP.”

Respectfully submitted,

THE FOLLOWING TRACK 1 DEFENDANTS

By: /s/ Katherine B. Schmeckpeper

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Dated: November 3, 2006

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered on November 3, 2006 to counsel for plaintiffs and to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, via LexisNexis File & Serve.

By: /s/ Katherine B. Schmeckpeper
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